

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13
STANISLAV P. TKHIR, AND :
IRINA TKHIR : NO. 12-20840

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Stanislav and Irina Tkhir have filed a Motion to Modify Plan after Confirmation with the court for an Amended Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **January 3, 2017** you or your attorney must do all of the following:

(a) file an answer explaining your position at the U.S. Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, Pennsylvania 19107.

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Michael P. Kelly, Esquire
Suite 202 - Penn's Square
402 Middletown Boulevard
Langhorne, PA 19047
phone (215) 741-1100
fax (215) 741-4029

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the **Honorable Stephen Raslavich** on **January 11, 2017** at **10:00 a.m.** in Courtroom **#4**, U.S. Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, Pennsylvania 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Dated: December 13, 2016